

EXHIBIT C

HAND BALDACHIN & AMBURGEY LLP

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Counsel for Plaintiff and Counterclaim Defendants

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SCHUTTE BAGCLOSURES, INC.,)
)
Plaintiffs)
)
v.)
)
KWIK LOK CORPORATION,)
)
Defendant.)
)
KWIK LOK CORPORATION,)
)
Counterclaim Plaintiff)
)
v.)
)
SCHUTTE BAGCLOSURES, INC., and)
SCHUTTE BAGCLOSURES B.V.,)
)
Counterclaim Defendants)
)

Case No. 12-cv-5541 (JGK)

AFFIDAVIT OF
JOHAN VOLMER

Johan Volmer, being duly instructed about the penalty of perjury under the laws of the United States of America (28 U.S.C. § 1746), states under penalty of perjury:

1. I am the managing partner of EP&C, a Dutch IP firm, and I respectfully submit this Affidavit in Support of Schutte Bagclosures Inc.'s ("Schutte Inc.") and Schutte Bagclosures B.V.'s ("Schutte BV"), Motion to Dismiss Kwik Lok Corporation's

Counterclaims for failure to state a claim against Schutte Inc. and Schutte BV pursuant to Federal Rule of Civil Procedure 12(b)(6) and to dismiss Schutte BV for lack of personal jurisdiction pursuant to Federal Rule of Civil Procedure 12(b)(2).

2. EP&C's main office is located at:

EP&C
Sir Winston Churchilllaan 295a
NL-2288 DC RIJSWIJK (THE HAGUE)
The Netherlands

3. EP&C handles Schutte BV's worldwide trademark portfolio and prosecution.
4. EP&C contacts, contracts with, and pays local trademark agents and attorneys around the world on behalf of its clients such as Schutte BV.
5. On July 13, 2011 EP&C filed an international trademark registration 1102006 designating US amongst others.
6. The USPTO issued a so-called provisional full refusal, which was forwarded by the WIPO by letter of February 27, 2012. Because according to US law EP&C does not qualify as an authorized attorney for practicing before the USPTO, on March 7, 2012 EP&C, selected, contracted with and paid the New York law firm Schroeder Law PC to file a full response to the provisional refusal with the USPTO in Washington, D.C. on Schutte BV's behalf..
7. Schutte BV did not select, hire, or pay the law firm under § 6 above in connection to the registration of its U.S. trademarks.

8. EP&C's engagement of the New York firm was not for the purpose of enabling Schutte BV to do business in New York.

DATED: December 19, 2013



Johan Volmer